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Counsel for Commerce Associates, LLC

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

THE RHODES COMPANIES, LLC,
Debtor.

Case No.: 09-14814-lbr
Chapter 11

REQUEST FOR SPECIAL NOTICE

TO: THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, DISTRICT OF
NEVADA, THE DEBTOR, ITS ATTORNEY AND ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that Commerce Associates, LLC ("Commerce"), hereby enters its
appearance on the record and requests that all notices of all events relevant to the above-referenced
bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced
bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure 2002
and in any adversary proceedings, be served on its attorneys as follows:

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1 In addition, Commerce requests that his attorneys be added to the Master Mailing List in this
2 case.

3 Neither this Request for Notice, nor any subsequent appearance, pleading, claim, proof of
4 claim, document, suit, motion, nor any other writing or conduct, shall constitute a waiver of
5 Commerce's:

6 1. Right to have any and all final orders in any and all non-core matters entered only
7 after *de novo* review by a United States District Court Judge;

8 2. Right to trial by jury in any proceeding as to any and all matters so triable herein,
9 whether or not the same be designated legal or private rights, or in any case, controversy or
10 proceeding related hereto, notwithstanding the designation *vel non* of such matters as "core
11 proceeding," pursuant to 28 U.S.C., § 157(b)(2), and whether such jury trial right is pursuant to
12 statute or the United States Constitution;

13 3. Right to have the reference withdrawn by the United States District Court in any
14 matter or proceeding subject to mandatory or discretionary withdrawal; and,

15 4. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which
16 this party is entitled under any agreements or at law or in equity or under the United States
17 Constitution.

18 All of the above rights are expressly reserved and preserved unto this party, without exception
19 and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other
20 participation in these matters.

21 DATED: June 20, 2014

ARMSTRONG TEASDALE LLP

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23 By: /s/ Gordon Goolsby
24 GORDON GOOLSBY, ESQ.
25 Nevada Bar No. 11578
26 ARMSTRONG TEASDALE LLP
27 3770 Howard Hughes Parkway, Suite 200
28 Las Vegas, Nevada 89169
Counsel for Commerce Associates, LLC

NOTICE OF ELECTRONIC SERVICE

I HEREBY CERTIFY that on the 20th day of June, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Reina S. Fortin
Reina S. Fortin, an employee of
Armstrong Teasdale LLP